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November 21, 2019

File No. 29133.265

VIA ECF and FEDEX Overnight

Hon. Paul E. Davison, U.S.M.J.
United States District Court, SDNY
The Hon. Charles L. Brieant Jr.
Federal Building and
United States Courthouse
300 Quarropas Street,
White Plains, NY 10601-4150

Re: Michael Holness, *et al.*, v. LG Chem Ltd., *et al.*,
Civil Action No. 7:17-cv-07726(NSR)(PED)
Defendant LG Chem's Opposition and Cross-Motion

Dear Judge Davison:

This office represents Defendant LG Chem, Ltd., ("LG Chem") in the above-referenced matter. In accordance with this Honorable Court's so-ordered briefing schedule, on November 21, 2019, LG Chem served its opposition to Plaintiffs' motion for sanctions and LG Chem's cross-motion via FedEx Overnight addressed to the Honorable Paul E. Davison, U.S.M.J. ("Opposition and Cross-Motion"). Due to the trade secret and confidential nature of the information at issue, LG Chem served their Opposition and Cross-Motion on this Honorable Court for *in camera* review.

A copy of LG Chem's Opposition and Cross-Motion in response to Plaintiffs' motion for sanctions was also served on all counsel of record via FedEx and email pursuant to the terms of the June 18, 2018, so-ordered Confidentiality Order in effect in this case.

Thank you for Your Honor's time and consideration with regard to this issue.

Respectfully,

/s/ Troy P. Cunningham

Troy P. Cunningham for
LEWIS BRISBOIS BISGAARD & SMITH LLP

TPC

cc: All Counsel of Record (via ECF)